PHILIP MORRIS USA INTER-OFFICE CORRESPONDENCE
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TO: Distribution

DATE: February 18, 1994

FROM: Victor Han

SUBJECT: EPA Communications Plan

Executive Summary

The contents of this binder are draft communications plans and documents for use when the court renders its judgment on the pending motion to dismiss.

In the case of a win or mixed decision, we have agreed to a low key approach with certain proactive options that would be decided upon once the court rules. At its core, the plan calls for reactive responses to media regarding the judgment and a reiteration of why we filed suit in the first place.

In the case of a loss, especially with little or no notice, geographical logistics do not allow for an ideal scheme with all spokespeople present in a central location backing each other up for print and satellite. As a result, the optimum measures we can put in place is assign satellite work to S. Parrish and print to B. Weber/D. Donohue wherever they happen to be at the time the decision is handed down. This is the optimum in our view though hardly perfect. To assemble at a central location would have too many people traveling when we need them most.

Please review these materials and contact Jack Lenzi or Vic Han with comments, concerns, additions or for explanations.

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